

RE: LLBG Permit
Conaway, Kathy (ECY) to: Fearon, Lee (ECY)
Cc: "Singleton, Deborah (ECY)"

items you can help provide and complete in moving this WAP to final draft.

History: This message has been replied to.

Thank you for sending this Lee and asking for guidance and help. As the permit writer, here is a list of

- Compare the LLGB WAP to the 222-S WAP and WRAP WAP, **specifically the EPA comments** in those WAPs. The majority of issues identified in these WAPs will need addressed in the LLBG WAP. Deborah can provide to you the WAP/Comments versions.
- LLGB WAP must demonstrate compliance with the LDR treatment standards. One significant difference in Trench 31/34 is it will be one of the few WAPs (if not the only one) that will routinely be applied to demonstrating compliance with LDR treatment stds, both method of treatment and concentration based treatment stds. This WAP is deficient as it does not show the sampling for demonstrating compliance as described above.
- LLGB WAP has some policy concerns. Trench 31/34 does not store waste. It only disposes of waste. Is there plans for a container storage unit? I thought that Ecology had decided to segregate Trench 31/34 and 94 from all of the unlined trenches. Where is that in this WAP?
- Waste Acceptance needs to be clearly defined and explained.

This bullet list is a good starting point on shaping this WAP up and making it acceptable and enforceable. Your help will be valuable if you can work on these items.

From: Fearon, Lee (ECY)

Sent: Tuesday, January 05, 2010 1:44 PM

To: Conaway, Kathy (ECY)

Cc: Singleton, Deborah (ECY); Mandis, Michelle (ECY)

Subject: LLBG Permit

Kathy: Michelle and I are working together on the LLBG permit. I have edited the Draft from 2004 that Deborah wrote. I have attached the edited version. Would you please look over this Draft and guide us in the protocols of how to proceed in the process? Thank you for your help and kind consideration.

Lee C. Fearon
Nuclear Waste Management Section
Nuclear Waste Program
Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354-1670

01/05/2010 05:41 PM

509-372-7933 | Ifea461@ecy.wa.gov 509-372-7971 FAX